I am strongly opposed to the Fists CW Organization proposed amateur rules changes in RM-10811, and in fact, favor the deletion of ANY Morse Code requirement for the amateur radio license structure.

Just as we no longer test for any aspects of spark mode transmission such as decrement setting, there is no longer any need for testing any class of amateur radio license for CW skills. Perhaps a CW recognition question would be alright, such as on the Foundation License in Great Britain. But, CW is just one of many modes in

amateur radio today; and there is no need to erect a barrier to new operators at a time when we need more amateur radio emergency communications operators to bolster Homeland defense. In recent major disasters such as Columbia Shuttle recovery, and CA wildfires, ham radio played a major communications role, but CW was not used, and was not appropriate to the Field environment that required emergency communications. No mode should be erected as a stand alone test element to be a barrier to anyone getting an amateur radio license. Tests should be concerned with operating procedures, radio regulations, and technical theory of radio science, as well as emergency communications procedures. Testing CW skills is a test of ones hearing, memorization, or tactile acuity, and none of these contribute to making a good radio operator under the purposes of the amateur radio license.

Fists has proposed taking amateur radio a step back in time, to irrelevant testing of skills no longer in use by commercial and emergency communications services, and thus only the amateur radio community would be able to use CW skill among themselves and in limited applications better served by modern digital keyboard modes.

Respectfully submitted for the betterment of emergency communications Stuart  ${\tt M.}$  Rohre